



## U.S. Department of Justice

*United States Attorney  
Southern District of New York**86 Chambers Street  
New York, New York 10007*

May 2, 2022

By ECF

The Honorable Valerie Figueredo  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Dominguez v. United States of America*, No. 21 Civ. 1962 (VF) (S.D.N.Y.)

Dear Judge Figueredo:

This Office represents the United States of America (the “Government”) in the above-referenced medical-malpractice action. I write respectfully and with the plaintiff’s consent to seek a one-month extension of the Government’s time to produce its expert reports and the parties’ time to complete expert discovery, to result in the following schedule:

	Old Deadline	New Deadline
Government’s Reports Due	May 6, 2022	June 6, 2022
End of Expert Discovery	May 27, 2022	June 27, 2022

This is the parties’ third request for an extension of expert discovery deadlines, the prior two requests having been granted.

As background, expert discovery commenced in this matter on January 19, 2022. On April 4, 2022, following two extensions of her deadline, the plaintiff produced expert reports for her two experts—OB-GYN Nicolas Psomiadis, M.D., and oncologist David Krag, M.D. Since that time, the Government’s experts have been working to analyze the medical care at issue in this litigation and respond to the plaintiff’s experts’ reports. However, given the complexity of the subject matter and the volume of the medical records at issue, the Government’s experts anticipate that they will need an additional month to complete their review of this matter and finalize their reports. Accordingly, the Government respectfully requests a one-month extension of the remaining expert discovery deadlines.

I thank the Court for its attention to this matter.

Respectfully submitted,

DAMIAN WILLIAMS  
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Southern District of New York

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